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February 23, 2023

**BY ECF**

Hon. Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Gulkarov, et al., 22 CR 20 (PGG) (SDNY)**

Dear Judge Gardephe:

I am writing on behalf of defendant Anthony DiPietro to respectfully request a modification of the defendant's conditions of release which would permit him to travel to Boca Raton, Florida from April 1 through April 9, 2023 to visit with family and continue clearing out his possessions following the sale of his Florida condominium. The government, by AUSA Mathew Andrews, has no objection to this request. Pretrial Services takes no position on this application, but notes that the defendant has been compliant throughout his supervision. If approved, Mr. DiPietro will provide Pretrial Services with a detailed itinerary of his travel.

By way of background, on January 12, 2022, Judge Moses released Mr. DiPietro on a \$250k personal recognizance bond cosigned by three financially responsible persons, with conditions, *inter alia*, limiting his travel to the Southern and Eastern Districts of New York. In the time since his release, the Court extended Mr. DiPietro's area of travel to include the Districts of New Jersey and Connecticut.

JEFFREY LICHTMAN

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Thank you for the Court's consideration on this application; I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'J. Lichtman', with a stylized, looped initial 'J' and a horizontal line extending to the right.

Jeffrey Lichtman

cc: Mathew Andrews, Esq.  
Assistant United States Attorney (by ECF)

Madalyn Toledo  
Pretrial Services (by email)

So Ordered:

A handwritten signature in black ink, appearing to be 'Paul G. Gardephe', written in a cursive style.

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Hon. Paul G. Gardephe

Dated: February 24, 2023